

## Message

**From:** Maraldo, Dean [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8076BC00B04C4AC1A4E608822A0DED7D-DMARALDO]  
**Sent:** 6/28/2018 11:47:32 PM  
**To:** Boczek, Laura [Boczek.Laura@epa.gov]; Smith, Jim [Smith.Jim@epa.gov]  
**CC:** Martin, Thomas [martin.thomas@epa.gov]  
**Subject:** Fw: MMSD production process for Milorganite

## Ex. 5 Deliberative Process (DP)

Thanks,  
 Dean

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Dean Maraldo  
 Water Enforcement & Compliance Assurance Branch  
 U.S. EPA - Region 5  
 77 West Jackson Blvd. (WC-15J)  
 Chicago, Illinois 60604  
 ph: (312) 353-2098  
 fax: (312) 385-5394  
 e-mail: maraldo.dean@epa.gov  
<http://www.epa.gov/enforcement/>

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**From:** Payne, James  
**Sent:** Thursday, June 28, 2018 6:35 PM  
**To:** Maraldo, Dean; Nelson, Leverett  
**Cc:** Holst, Linda; Thiede, Kurt; Kuefler, Patrick; Martin, Thomas; Klassman, Debra; Peaceman, Karen  
**Subject:** RE: MMSD production process for Milorganite

## Ex. 5 Deliberative Process (DP)

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**From:** Maraldo, Dean  
**Sent:** Thursday, June 28, 2018 6:08 PM  
**To:** Payne, James <payne.james@epa.gov>; Nelson, Leverett <nelson.leverett@epa.gov>  
**Cc:** Holst, Linda <holst.linda@epa.gov>; Thiede, Kurt <thiede.kurt@epa.gov>; Kuefler, Patrick <kuefler.patrick@epa.gov>; Martin, Thomas <martin.thomas@epa.gov>; Klassman, Debra <klassman.debra@epa.gov>; Peaceman, Karen <Peaceman.Karen@epa.gov>  
**Subject:** RE: MMSD production process for Milorganite

## Ex. 5 Deliberative Process (DP)

**From:** Payne, James

**Sent:** Thursday, June 28, 2018 5:48 PM

**To:** Nelson, Leverett <[nelson.leverett@epa.gov](mailto:nelson.leverett@epa.gov)>

**Cc:** Holst, Linda <[holst.linda@epa.gov](mailto:holst.linda@epa.gov)>; Maraldo, Dean <[Maraldo.Dean@epa.gov](mailto:Maraldo.Dean@epa.gov)>; Thiede, Kurt <[thiede.kurt@epa.gov](mailto:thiede.kurt@epa.gov)>; Kuefler, Patrick <[kuefler.patrick@epa.gov](mailto:kuefler.patrick@epa.gov)>; Martin, Thomas <[martin.thomas@epa.gov](mailto:martin.thomas@epa.gov)>; Klassman, Debra <[klassman.debra@epa.gov](mailto:klassman.debra@epa.gov)>; Peaceman, Karen <[Peaceman.Karen@epa.gov](mailto:Peaceman.Karen@epa.gov)>

**Subject:** RE: MMSD production process for Milorganite

## Ex. 5 Deliberative Process (DP)

**From:** Nelson, Leverett

**Sent:** Tuesday, June 26, 2018 12:51 PM

**To:** Payne, James <[payne.james@epa.gov](mailto:payne.james@epa.gov)>

**Cc:** Holst, Linda <[holst.linda@epa.gov](mailto:holst.linda@epa.gov)>; Maraldo, Dean <[Maraldo.Dean@epa.gov](mailto:Maraldo.Dean@epa.gov)>; Thiede, Kurt <[thiede.kurt@epa.gov](mailto:thiede.kurt@epa.gov)>; Kuefler, Patrick <[kuefler.patrick@epa.gov](mailto:kuefler.patrick@epa.gov)>; Martin, Thomas <[martin.thomas@epa.gov](mailto:martin.thomas@epa.gov)>; Klassman, Debra <[klassman.debra@epa.gov](mailto:klassman.debra@epa.gov)>; Peaceman, Karen <[Peaceman.Karen@epa.gov](mailto:Peaceman.Karen@epa.gov)>

**Subject:** FW: MMSD production process for Milorganite

Jim-

## Ex. 5 Deliberative Process (DP)

-Rett

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**From:** Payne, James

**Sent:** Friday, June 22, 2018 6:44 PM

**To:** Holst, Linda <[holst.linda@epa.gov](mailto:holst.linda@epa.gov)>; Maraldo, Dean <[Maraldo.Dean@epa.gov](mailto:Maraldo.Dean@epa.gov)>

**Cc:** Thiede, Kurt <[thiede.kurt@epa.gov](mailto:thiede.kurt@epa.gov)>; Kuefler, Patrick <[kuefler.patrick@epa.gov](mailto:kuefler.patrick@epa.gov)>; Martin, Thomas <[martin.thomas@epa.gov](mailto:martin.thomas@epa.gov)>; Nelson, Leverett <[nelson.leverett@epa.gov](mailto:nelson.leverett@epa.gov)>

**Subject:** MMSD production process for Milorganite

## Ex. 5 Deliberative Process (DP)

## DRAFT DESCRIPTION OF MMSD MILORGANITE PRODUCTION PROCESS

A step in MMSD's production of Milorganite is running the material through a drier. 12 parallel metal chutes move material through 12 parallel driers. 99% or so of the material is then run through a second drier; about 1% of the material runs through only one drier, equating to 100s of bags of Milorganite per day.

Temperature probes are on the metal chute casings at a point 19 feet downstream of the driers.

There is not a system for addressing the situation where a probe does not meet the regulatory temperature level, whether it is the first or second drier run. For example, there is not a rerouting of material into a drier that is known to be meeting the regulatory temperature.

In Fall 2016 inspections, the temperatures measured at the probes frequently were significantly below the regulatory level. On many days, for many hours, all 12 temperature probes were below the regulatory temperature level, with some measurements at half the regulatory temperature level.

A survey of other similar producers of this material in the country did not reveal difficulties with measuring the temperature of material in the driers and meeting the regulatory temperature level.

Several States have expressed concern with the safety of MMSD's Milorganite sold in commerce.

This description relies in part on input from R7 biosolid experts.

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**From:** Payne, James

**Sent:** Friday, June 22, 2018 1:41 PM

**To:** Holst, Linda <[holst.linda@epa.gov](mailto:holst.linda@epa.gov)>; Maraldo, Dean <[Maraldo.Dean@epa.gov](mailto:Maraldo.Dean@epa.gov)>

**Cc:** Thiede, Kurt <[thiede.kurt@epa.gov](mailto:thiede.kurt@epa.gov)>; Kuefler, Patrick <[kuefler.patrick@epa.gov](mailto:kuefler.patrick@epa.gov)>; Martin, Thomas <[martin.thomas@epa.gov](mailto:martin.thomas@epa.gov)>; Nelson, Leverett <[nelson.leverett@epa.gov](mailto:nelson.leverett@epa.gov)>

**Subject:** RE: MMSD info

## Ex. 5 Deliberative Process (DP)

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**From:** Holst, Linda

**Sent:** Wednesday, June 20, 2018 2:12 PM

**To:** Payne, James <[payne.james@epa.gov](mailto:payne.james@epa.gov)>

**Cc:** Thiede, Kurt <[thiede.kurt@epa.gov](mailto:thiede.kurt@epa.gov)>; Maraldo, Dean <[Maraldo.Dean@epa.gov](mailto:Maraldo.Dean@epa.gov)>; Kuefler, Patrick <[kuefler.patrick@epa.gov](mailto:kuefler.patrick@epa.gov)>; Martin, Thomas <[martin.thomas@epa.gov](mailto:martin.thomas@epa.gov)>; Nelson, Leverett <[nelson.leverett@epa.gov](mailto:nelson.leverett@epa.gov)>

**Subject:** FW: MMSD info

## Ex. 5 Deliberative Process (DP)

Linda

**From:** Maraldo, Dean

**Sent:** Wednesday, June 20, 2018 11:28 AM

**To:** Holst, Linda <[holst.linda@epa.gov](mailto:holst.linda@epa.gov)>

**Cc:** Bahr, Ryan <[bahr.ryan@epa.gov](mailto:bahr.ryan@epa.gov)>; Martin, Thomas <[martin.thomas@epa.gov](mailto:martin.thomas@epa.gov)>

**Subject:** MMSD info

## **Ex. 5 Deliberative Process (DP)**

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